

1 ROB BONTA (SBN 202668)
2 **Attorney General of California**
3 PREETI K. BAJWA (SBN 232484)
4 **Supervising Deputy Attorney General**
5 ANTHONY N. CORSO (SBN 280618)
6 COLIN A. SHAFF (SBN 300301)
7 **Deputy Attorney General**
8 455 Golden Gate Avenue, Suite 11000
9 San Francisco, CA 94102-7004
10 Telephone: (415) 510-4429
11 Fax: (415) 703-5843
12 Anthony.CORSO@doj.ca.gov

13 *Counsel for Defendants*

14 CANDICE JACKSON (SBN 224648)
15 **FREEMAN MATHIS & GARY, LLP**
16 1010 B Street, Suite 300
17 San Rafael, California 94901
18 Telephone: (415) 352-6434
19 cjakson@fmglaw.com

20 LAUREN ADAMS (*Pro Hac Vice*)
21 **WOMEN'S LIBERATION FRONT**
22 1802 Vernon St. NW, #2036
23 Washington, DC 20009
24 Telephone: (202) 964-1127
25 legal@womensliberationfront.org

26 *Counsel for Plaintiffs*

27 DIMITRI D. PORTNOI (SBN 282871)
28 **O'MELVENY & MYERS LLP**
29 400 South Hope Street, 18th Floor
30 Los Angeles, California 90071
31 Telephone: (213) 430-6000
32 dportnoi@omm.com

33 *Counsel for Proposed Intervenors*

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35 IN THE UNITED STATES DISTRICT COURT
36 FOR THE EASTERN DISTRICT OF CALIFORNIA
37 FRESNO DIVISION

38
39 **JANINE CHANDLER, et al.,**

40 Plaintiffs,

41 **v.**

42 **CALIFORNIA DEP'T OF CORRECTIONS**
43 **AND REHABILITATION, et al.,**

44 Defendants.

45 Case No. 1:21-cv-01657-JLT-HBK

46 **JOINT STIPULATION TO EXTEND**
47 **BRIEFING SCHEDULE AND ORDER**

48 Date:

49 Time:

50 Courtroom:

51 Judge: The Honorable Helena M.
52 Barch-Kuchta

53 Trial Date:

54 Action Filed: November 17, 2021

55 Defendants California Department of Corrections and Rehabilitation, Kathleen Allison,
56 Mona Houston, and Michael Pallares together with Plaintiffs Janine Chandler, Krystal Gonzalez,
57 Tomiekia Johnson, Nadia Romero, and Woman II Woman by and through their respective
58

1 counsel of record, and subject to the approval of the Court, hereby enter into the following
2 Stipulation:

3 WHEREAS, Plaintiffs filed their Complaint For Declaratory and Injunctive Relief on
4 November 17, 2021.

5 WHEREAS, Defendants filed a Motion to Dismiss Complaint Pursuant to Federal Rules of
6 Civil Procedure 12(B)(1) And 12(B)(6) (the “Motion to Dismiss”) on April 11, 2022.

7 WHEREAS, pursuant to this Court’s Local Rules, any opposition to Defendants’ Motion to
8 Dismiss is due on April 25, 2022.

9 WHEREAS, counsel for four individuals and one organization (“Proposed Intervenors”)
10 have alerted counsel for Plaintiffs and Defendants of (1) their clients’ intent to move to intervene
11 in the above-captioned action and (2) their clients’ desire to file a brief in support of the Motion
12 to Dismiss.

13 WHEREAS, Proposed Intervenors met with counsel for Plaintiffs on April 15, 2022, and
14 counsel for Plaintiffs indicated they would not oppose a motion to intervene by Proposed
15 Intervenors.

16 WHEREAS, due to preexisting commitments and conflicts, counsel for Defendants cannot
17 meet and confer with Proposed Intervenors until April 28, 2022 at the earliest, which is later than
18 any opposition to the Motion to Dismiss would currently be due.

19 WHEREAS, to allow time for Proposed Intervenors to meet and confer with Defendants,
20 file their motion to intervene, and file a brief in support of Defendants’ Motion to Dismiss before
21 any opposition is due, the parties together with Proposed Intervenors propose the following
22 modified briefing schedule:

Event	Date
Deadline for Proposed Intervenors and Defendants to Meet and Confer	May 2, 2022

Deadline for Proposed Intervenors to File Motion to Intervene	May 9, 2022
Deadline for Proposed Intervenors' Brief in Support of Defendants' Motion to Dismiss	May 16, 2022
Deadline for Plaintiffs' Opposition to Defendants' Motion to Dismiss	May 31, 2022
Deadline for Replies	June 10, 2022

NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, the parties together with counsel for Proposed Intervenors hereby stipulate and agree, subject to the approval of the Court, to adopt the briefing schedule proposed herein. This stipulation may be executed in counterparts.

SO STIPULATED.

Dated: April 20, 2022

STATE OF CALIFORNIA DEPARTMENT
OF JUSTICE, OFFICE OF THE
ATTORNEY GENERAL

By: /s/ Preeti K. Bajwa
Preeti K. Bajwa
Counsel for Defendants

Dated: April 20, 2022

FREEMAN MATHIS & GARY, LLP

By: /s/ Candice Jackson
(as authorized on April 20, 2022)
Candice Jackson
Counsel for Plaintiffs

1 Dated: April 20, 2022

O'MELVENY & MYERS LLP

2
3 By: /s/ Dimitri D. Portnoi
4 (as authorized on April 20, 2022)
5 Dimitri D. Portnoi
Counsel for Proposed Intervenors

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8 **ORDER**

9 The above stipulation is approved.

10 IT IS SO ORDERED.

11 Dated: April 21, 2022


12 UNITED STATES DISTRICT JUDGE

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